

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

A.A., A.B., A.D., A.G., A.P., A.S., A.V., Al.C., Am.P., An.A.,  
An.D., Ar.A., Ari.R., Arn.R., B.D., B.M., B.T., C.C., C.S., C.V.,  
D.D.R., D.L., E.A., E.C., E.D.C., E.D.L., E.G., E.L., E.M., Ed.T.,  
En.C., Er.T., F.B., F.S., F.T., G.A., G.D.L., G.G., G.O., G.S.,  
G.T., H.V., I.E., J.A., J.B., J.C., J.D.C., J.F., J.J.G., J.L., J.N.B.,  
J.O., J.P., J.S., J.T., Ji.T., Jo.B., L.G., L.L., L.N., L.P., L.V.,  
M.A., M.D.L., M.G., M.R., M.S., N.C., P.C., R.A., R.B., R.B.E.,  
R.C., R.D., R.E., R.F., R.I., R.L., R.N., R.P., R.S., R.T., R.V.,  
Ra.D., Ra.G., Ra.L., Ra.V., Re.C., Re.D., Rh.P., Ri.C., Ri.O.,  
Ro.D., Ro.L., Ro.P., Rod.O., Rog.B., Rol.P., Rom.B., Ron.O.,  
S.N., T.L., V.A., V.B., V.M., and W.B.,

Plaintiffs,

v.

OMNICOM GROUP INC., PORTLAND PR INC., OGILVY  
GROUP, LLC, OGILVY PUBLIC RELATIONS WORLDWIDE  
LLC, and MEMAC OGILVY & MATHER LLC,

Defendants.

Case No.: 1:25-cv-03389

**DECLARATION OF  
WILLIAM S. KUKIN**

**WILLIAM S. KUKIN**, an attorney duly admitted to practice before the United States District Court for the Southern District of New York, declares under penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am an attorney at the law firm Davis+Gilbert LLP, counsel for Omnicom Group Inc. and Portland PR Inc. in the above-captioned action. I submit this Declaration in support of Defendants' Motion to Dismiss the Complaint (ECF No. 1). I am fully familiar with the facts and circumstances herein based on my representation of Omnicom Group Inc. and Portland PR Inc. ("Portland") in this action.

2. Attached hereto as Exhibit 1 is a true and correct copy of a document that Portland filed with the Foreign Agents Registration Act ("FARA") Unit of the United States Department of

Justice (“DOJ”), identifying the Government of Qatar as foreign principal. Exhibit 1 indicates that it was received by DOJ’s FARA Registration Unit on September 16, 2014. Exhibit 1 includes a service agreement between Portland and Portland PR Ltd., effective January 1, 2014 (Ex. 1 at pages 5–13).

3. Attached hereto as Exhibit 2 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar, Washington D.C. as foreign principal. Exhibit 2 indicates that it was received by DOJ’s FARA Registration Unit on January 15, 2015. Exhibit 2 includes a services agreement between Portland and Embassy of the State of Qatar, Washington D.C., effective January 1, 2015 (the “2015 Services Agreement,” Ex. 2 at pages 5–12).

4. Attached hereto as Exhibit 3 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar, Washington D.C. as foreign principal. Exhibit 3 indicates that it was received by DOJ’s FARA Registration Unit on April 7, 2016. Exhibit 3 includes a letter agreement, dated December 22, 2015, extending the 2015 Services Agreement between Portland and Embassy of the State of Qatar, Washington D.C. (Ex. 3 at page 3).

5. Attached hereto as Exhibit 4 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar, Washington D.C. as foreign principal. Exhibit 4 indicates that it was received by DOJ’s FARA Registration Unit on July 26, 2016. Exhibit 4 includes a letter agreement between Portland and Embassy of the State of Qatar, dated July 25, 2016, extending the 2015 Services Agreement (Ex. 4 at pages 3–4).

6. Attached hereto as Exhibit 5 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying the Government of Qatar and the Embassy of the

State of Qatar (through Portland PR Ltd.) as foreign principal. Exhibit 5 indicates that it was received by DOJ's FARA Registration Unit on December 6, 2017. Exhibit 5 includes a project agreement between Portland and Portland PR. Ltd. (QFC Branch), effective May 1, 2017 (Ex. 5 at page 3).

7. Attached hereto as Exhibit 6 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying Qatar Foundation (through Portland PR Ltd.) as foreign principal. Exhibit 6 indicates that it was received by DOJ's FARA Registration Unit on December 6, 2017. Exhibit 6 includes a project agreement between Portland and Portland PR Ltd., effective June 21, 2017 (Ex. 6 at page 5).

8. Attached hereto as Exhibit 7 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 7 indicates that it was received by DOJ's FARA Registration Unit on June 15, 2018. Exhibit 7 includes a services agreement between Portland and State of Qatar - Government Communications Office, effective January 1, 2018 (Ex. 7 at pages 5–13).

9. Attached hereto as Exhibit 8 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 8 indicates that it was received by DOJ's FARA Registration Unit on October 31, 2018. Exhibit 8 includes a services agreement between Portland and State of Qatar - Government Communications Office, effective July 1, 2018 (Ex. 8 at pages 3–11).

10. Attached hereto as Exhibit 9 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 9 indicates that it was received by DOJ's FARA Registration Unit on

March 26, 2019. Exhibit 9 includes a services agreement between Portland and State of Qatar - Government Communications Office, effective January 1, 2019 (Ex. 9 at pages 5–13).

11. Attached hereto as Exhibit 10 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 10 indicates that it was received by DOJ's FARA Registration Unit on October 11, 2019. Exhibit 10 includes a services agreement between Portland and State of Qatar - Government Communications Office, effective July 1, 2019 (Ex. 10 at pages 3–11).

12. Attached hereto as Exhibit 11 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 11 indicates that it was received by DOJ's FARA Registration Unit on November 12, 2020. Exhibit 11 includes a services agreement between Portland and State of Qatar - Government Communications Office, effective July 1, 2020 (Ex. 11 at pages 5–13).

13. Attached hereto as Exhibit 12 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 12 indicates that it was received by DOJ's FARA Registration Unit on July 16, 2021. Exhibit 12 includes a services agreement between Portland and State of Qatar - Government Communications Office, effective July 1, 2021 (Ex. 12 at pages 5–13).

14. Attached hereto as Exhibit 13 is a true and correct copy of a document that Portland filed with the FARA Unit of DOJ, identifying State of Qatar - Government Communications Office as foreign principal. Exhibit 13 indicates that it was received by DOJ's FARA Registration Unit on January 11, 2023. Exhibit 13 includes a letter agreement, dated November 2, 2022, extending the July 1, 2021 service agreement between Portland and the State of Qatar (Ex. 13 at pages 6–8).

15. Attached hereto as Exhibit 14 is a true and correct copy of a document that Mercury Public Affairs LLC (“Mercury”) filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar as foreign principal. Exhibit 14 indicates that it was received by DOJ’s FARA Registration Unit on January 2, 2015. Exhibit 14 includes a consulting services agreement between Mercury and Embassy of the State of Qatar, Washington, D.C., effective January 1, 2015 (the “2015 Consulting Services Agreement,” Ex. 14 at pages 5–12).

16. Attached hereto as Exhibit 15 is a true and correct copy of a document that Mercury filed with the FARA Unit of the DOJ. Exhibit 15 indicates that it was received by DOJ’s FARA Registration Unit on August 13, 2015. Exhibit 15 includes a letter agreement between Mercury and Embassy of the State of Qatar, dated August 5, 2015, extending the 2015 Consulting Services Agreement (Ex. 15 at page 1).

17. Attached hereto as Exhibit 16 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar as foreign principal. Exhibit 16 indicates that it was received by DOJ’s FARA Registration Unit on January 15, 2016. Exhibit 16 includes a letter agreement between Mercury and Embassy of the State of Qatar, dated December 22, 2015, extending the 2015 Consulting Services Agreement (Ex. 16 at pages 3–4).

18. Attached hereto as Exhibit 17 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ. Exhibit 17 indicates that it was received by DOJ’s FARA Registration Unit on August 19, 2016. Exhibit 17 includes a letter agreement between Mercury and Embassy of the State of Qatar, dated August 1, 2016, extending the 2015 Consulting Services Agreement (Ex. 17 at page 1).

19. Attached hereto as Exhibit 18 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ. Exhibit 18 indicates that it was received by DOJ’s FARA

Registration Unit on January 30, 2017. Exhibit 18 includes a letter agreement between Mercury and Embassy of the State of Qatar, dated December 20, 2016, extending the 2015 Consulting Services Agreement (Ex. 18 at page 3).

20. Attached hereto as Exhibit 19 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ. Exhibit 19 indicates that it was received by DOJ's FARA Registration Unit on April 13, 2017. Exhibit 19 includes a letter agreement between Mercury and Embassy of the State of Qatar, dated April 7, 2017, extending the 2015 Consulting Services Agreement (Ex. 19 at page 1).

21. Attached hereto as Exhibit 20 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ. Exhibit 20 indicates that it was received by DOJ's FARA Registration Unit on September 14, 2017. Exhibit 20 includes a letter agreement between Mercury and the Government Communications Office, State of Qatar, dated September 7, 2017, extending the 2015 Consulting Services Agreement and stating that "[t]he Embassy has assigned this Agreement to the Government Communications Office of the State of Qatar, and Mercury consents to such assignment" (Ex. 20 at page 1).

22. Attached hereto as Exhibit 21 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ, identifying Government Communications Office of the State of Qatar (previously, Embassy of the State of Qatar) as foreign principal. Exhibit 21 indicates that it was received by DOJ's FARA Registration Unit on February 13, 2019. Exhibit 21 includes a letter agreement between Mercury and the Government Communications Office, State of Qatar, dated February 8, 2019, extending the 2015 Consulting Services Agreement and stating that "[t]he Embassy has assigned this Agreement to the Government Communications Office of the State of Qatar, and Mercury consents to such assignment" (Ex. 21 at page 3).

23. Attached hereto as Exhibit 22 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar as foreign principal. Exhibit 22 indicates that it was received by DOJ's FARA Registration Unit on December 10, 2019. Exhibit 22 includes a consulting services agreement between Mercury and Embassy of the State of Qatar, effective November 1, 2019 (Ex. 22 at pages 5–13).

24. Attached hereto as Exhibit 23 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar as foreign principal. Exhibit 23 indicates that it was received by DOJ's FARA Registration Unit on February 2, 2022. Exhibit 23 includes an amended agreement, dated January 1, 2022, extending a January 1, 2020 consulting service agreements between Mercury and Embassy of the State of Qatar (Ex. 23 at page 5).

25. Attached hereto as Exhibit 24 is a true and correct copy of a document that Mercury filed with the FARA Unit of DOJ, identifying Embassy of the State of Qatar as foreign principal. Exhibit 24 indicates that it was received by DOJ's FARA Registration Unit on March 1, 2023. Exhibit 24 includes an amended agreement, dated January 1, 2023, extending a January 1, 2020 consulting services agreement between Mercury and Embassy of the State of Qatar (Ex. 24 at page 6).

Dated: August 1, 2025  
New York, New York

/s/ William S. Kukin  
William S. Kukin